

## REMARKS/ARGUMENTS

Claims 15 and 30 are canceled. Claims 1-14, 16-29 and 31-41 remain in the application.

Applicant believes the application is in condition for allowance. Allowance of the application at an early date is respectfully requested.

Claims 1-8, 17, 22-25 and 32-34 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Japanese Publication of Koshu (Japanese Publication Number: JP 2003-345255 A) in view of the Japanese Publication of Dobashi (Japanese Publication Number: JP 2002-318405 A), which the examiner relied on in his earlier rejection. The examiner states that Koshu teaches an apparatus for securing a mobile terminal, the securing apparatus comprising a sheet and an adhesive applied on the sheet. The sheet may be releasably adhered to the surface of the mobile terminal, and the sheet is altered upon removal from the surface. The examiner relies on Dobashi to show a digital camera and a sheet acting as a barrier placed over the lens of the camera. The examiner concludes it would have been obvious to combine Koshu and Dobashi.

The Applicant respectfully submits that the references do not suggest the presently claimed invention, either singly or taken in any reasonable combination. Independent claims 1, 22 and 34 define a securing apparatus and method and recite, *inter alia*, a sheet which may be releasably adhered to the surface of the mobile terminal for covering the lens to substantially prevent image capture by the imaging device. The feature of a sheet being releasably adhered as claimed is neither taught nor suggested by the references.

Koshu is directed to a label which separates upon removal by peeling. However, Koshu does not teach a label that is releasably adhered as relied on by the examiner. This is particularly true with respect to the portion of the Koshu label that is left on an object after separation. Therefore, the references, even if combined, fail to show each and every element of the presently claimed invention. Thus, the examiner has failed to make a *prima facie* case of obviousness.

The claimed releasable adherence of the sheet contributes significantly to the goal of securing an imaging device against use, which benefits the user. At the same time, the releasability allows the sheet to be removed without damaging, or providing any significant lasting effects to the lens, which benefits the possessor of the mobile terminal. Koshu fails to recognize and thus realize the advantages which the Applicant has achieved with his invention with the appropriate releasable adhesive. If that feature were

indeed obvious, it would have been disclosed in Koshu as relied upon by the Examiner. Because Koshu does not show such a design, Applicant respectfully submits it is not obvious to secure the lens of a mobile terminal in the claimed manner.

Therefore, Applicant believes claims 1, 22 and 34 define a novel securing apparatus and method which is not fairly suggested by the prior art, either alone or in any reasonable combination.

Claims 2-14, 16-21, 23-29, 31-33 and 35-41 of the present application all depend from independent claims 1, 22 and 34. In addition to the distinguishing features recited in the independent claims and discussed above, the securing apparatus and method of the present invention have additional advantageous features defined in the dependent claims, which further distinguish the present invention over the prior art.

For the foregoing reasons, the Applicant respectfully submits that claims 1-14, 16-29 and 31-41 are now in condition for allowance. Allowance of the application at an early date is respectfully requested.

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